

REMARKS

Claims 1-15 remain pending and are amended via the present submission. No claims are added or canceled.

Claims 1-15 stand objected to because they were missing commas. As shown above, the claims are now amended, and commas are added. Withdrawal of the objection is now requested.

Claim 6 stands rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. Applicants respectfully submit that the rejection should be withdrawn.

The Office Action implies that the description of the information exchange file generator would not be clear to one of ordinary skill in the art. In particular, the Office Action quotes the claim recitation of “the selected appliance if the selected appliance is not existent within the independent system network the server controls and which sends the generated description.”

However, the corresponding specification, *e.g.*, the paragraph beginning on page 9 at line 13 (paragraph [0035] in the published application), describes this subject matter. File generator 54 generates, in a universal format, a file (the “description of control”) corresponding to an appliance (“the selected appliance”) in cooking system network 30 (*i.e.*, “the selected appliance is not existent within the independent system network the server controls”). The paragraph beginning at page 10 at line 9 (paragraph [0037] in the published application) explains that cooking system server 32 receives the file, which means that file generator 54 “sends the generated description” as described in the claim.

Applicants submit that one skilled in the art would understand this correspondence of the specification to claim 6, and therefore claim 6 is enabled as required by 35 U.S.C. § 112, first

paragraph. Nonetheless, to expedite prosecution, applicants amend claim 6 for additional clarification.

Withdrawal of the enablement rejection is now requested.

Claims 1-15 stand rejected under 35 U.S.C. § 112, second paragraph, as indefinite. Applicants respectfully submit that the rejection should be withdrawn.

Each claim has been reviewed and, in many instances, amended to address matters of form. Applicants nonetheless submit that, even where the grammar may have been incorrect, the description was never so unclear that one skilled in the art would not understand the claim boundaries and thereby justify an indefiniteness rejection. If the Examiner retains the belief that parts of the claims are still this unclear, applicants request that the next Office Action cite an example of the supposedly unclear description.

Regarding claim 7, this claim is amended so that it no longer describes a “reserved information format” as a “*practically* reserved information format.” The claim also now specifies characteristics of the “reserved information format.” Accordingly, one skilled in the art can easily understand the meaning of the claim 7.

One of the noteworthy features of the present invention is the ability to control an appliance A of one independent system network with an input device originally designed to control an appliance B of a different independent system network. This can be realized by transforming/translating specific information for controlling the appliance B (*e.g.*, information in “first information format” in claims 1, 5, and 8 or in “format to be used for controlling a specific appliance” in claims 7 and 12) into a more universal format (*e.g.*, “second information format” in claims 1, 5, and 8 or “reserved information format” in claims 7 and 12). Then, the transformed

information is transmitted to the independent system network of appliance A from the network of appliance B and, based thereon, a command for controlling the appliance A is obtained.

As an example, consider two independent system networks: one, which includes a television, and another, which includes a microwave oven. The information format for the television differs from that for the microwave oven. The channel buttons of the television controller are, generally speaking, buttons for inputting numerals. A “channel,” which is specific information inputted via the television channel buttons of the television controller, falls in the category of universal information as a “numeral.” Such universal information is understood also in the network of the microwave oven, and a command for controlling the microwave oven can be generated utilizing the universal information. Therefore, the microwave oven, which belongs to a different independent system network from that to which the television belongs, can be controlled by the television controller.

Information in “reserved information format” corresponds to such universal information, and, as recited in claim 7, the reserved information format is “obtained by transforming a format to be used for controlling a specific appliance.” The reserved information format is utilized in communication between servers for conducting control of an appliance over different independent system networks. One skilled in the art would clearly understand the meaning of claim 7, especially in its present form.

Accordingly, withdrawal of the indefiniteness rejection is how requested.

Claims 1-5 and 8-12 stand rejected under 35 U.S.C. § 102(e) as anticipated by *Gidwani* (U.S. Patent No. 6,640,239). Applicants respectfully submit that the rejection should be withdrawn.

Claim 1 describes a network system having a plurality of independent system networks, each having its own server. Each server has a “format transformer,” and the claim specifies that the format transformer transforms a first information format to a second information format and vice versa. The first format is used for managing appliances within the server’s network, and the second format is used for exchanging information with other servers. Claims 2-4 depend from claim 1, so the systems they describe also have such a format transformer in each of the plurality of independent system networks.

Claim 5 describes an individual network server, and that network server also has a format transformer that transforms a first information format to a second information format and vice versa. (Because the claim describes an individual network server, the second format is described as “used for exchanging information with outside”.)

Claim 8 describes a network system controlling method, wherein each server of a plurality of independent system networks transforms a first information format to a second information format and vice versa. Claims 9-11 depend from claim 8, so the methods they describe also includes transforming format as discussed. Claim 12 also describes a network system controlling method wherein the servers of a plurality of independent system networks communicate with each other using a “reserved information format.” (The significance of the “reserved information format” is discussed above with respect to the indefiniteness rejection of claim 7.)

Applicants respectfully submit that *Gidwani* does not teach or suggest the subject matter presented above as specifically recited in the amended claims. *Gidwani* merely discloses a means for transmitting voice packets for VOIP or for television conference system in ATM format. *Gidwani* never teach or suggests the idea of the present invention where seamless

communication between independent system networks can be realized by utilizing two types of information format for communication between the networks, thereby allowing an input unit for an appliance in one network to be utilized to control an appliance in another network.

Accordingly, withdrawal of the anticipation rejection of claims 1-5 and 8-12 is hereby solicited.

Claims 6 and 7 stand rejected under 35 U.S.C. § 103(a) as obvious over *Gidwani* in view of *Kerchner* (U.S. Patent No. 6,559,882). Applicants submit that the rejection should be withdrawn.

Regarding claim 6, this claim depends from claim 5, and, as explained above, *Gidwani* does not anticipate claim 5. Although the rejection of claim 6 is based also on *Kerchner*, and although this rejection is based on obviousness instead of on anticipation, the obviousness rejection of claim 6 is based in part on *Gidwani* anticipating parent claim 5. Because, as discussed above, *Gidwani* cannot anticipate claim 5, the obviousness rejection of claim 6 should be withdrawn.

Regarding claim 7, this claim describes a network system such that each server of a plurality of independent system networks mutually communicate using a “reserved information format” as discussed above. Neither *Gidwani* nor *Kerchner*, either alone or combined, teach or suggest a network system using a reserved information format specifically as described in claim 7. *Kerchner* merely discloses controlling a specific device via a Web page. *Gidwani* does not disclose using two types of information format, as described earlier. The network system described by claim 7 realizes the significant effect described above that cannot be realized by developing a network system in accordance with the *Gidwani* and *Kerchner* disclosures. Accordingly, the obviousness rejection of claim 7 should be withdrawn.

Claims 13-15 stand rejected under 35 U.S.C. § 103(a) as obvious over *Gidwani* in view of *Aua et al.* (U.S. Patent Application Publication No. 2002/0069296 A1). Applicants submit that the rejection should be withdrawn.

Claims 13-15 each depend from claim 1, and, as explained above, *Gidwani* does not anticipate claim 1. Although the rejection of claims 13-15 is based also on *Aua et al.*, and although this rejection is based on obviousness instead of on anticipation, the obviousness rejection of claims 13-15 is based in part on *Gidwani* anticipating parent claim 1. Because, as discussed above, *Gidwani* cannot anticipate claim 1, the obviousness rejection of dependent claims 13-15 should be withdrawn.

In view of the remarks above, applicants submit that the entire application is in condition for allowance. Accordingly, a Notice of Allowability is hereby requested. If for any reason it is believed that this application is not now in condition for allowance, the Examiner is invited to contact applicants' undersigned attorney at the telephone number indicated below to arrange for disposition of this case.

In the event that this paper is not timely filed, applicants petition for an appropriate extension of time. The fees for such an extension, or any other fees which may be due, may be charged to Deposit Account No. 50-2866.

Respectfully submitted,
WESTERMAN, HATTORI, DANIELS & ADRIAN, LLP

A handwritten signature in black ink, appearing to read "Joseph L. Felber", with a stylized flourish at the end.

Joseph L. Felber
Attorney for Applicants
Reg. No. 48,109

Atty. Docket No. **021381**
1250 Connecticut Avenue, N.W., Suite 700
Washington, DC 20036
Tel: (202) 822-1100
Fax: (202) 822-1111

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